

Western Union's Modern Slavery and Human Trafficking Statement for 2020

June 30, 2021

WesternUnion // WU

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Reporting entities

This statement is made by The Western Union Company (the “Company”) pursuant to the Australian Commonwealth Modern Slavery Act 2018 and section 54(l) of the UK Modern Slavery Act 2015 on behalf of its affiliates conducting business in Australia and the UK. It is our statement for the financial year ended 31 December 2020. It applies to and has been approved by the boards of the entities below.

Company	Company Number
Western Union Financial Services (Australia) Pty Ltd	082282773
Western Union Business Solutions (Australia) Pty Ltd	150129749
Custom House Financial (UK) Limited	4380026
Western Union Retail Services GB Limited	2383761
Western Union GB Limited	4129906
Western Union Payment Services GB Limited	11326797
Western Union International Bank GmbH	FN256184t
Western Union Payment Services Ireland Limited	471360

Our current Modern Slavery and Human Trafficking Statement and those for previous financial years can be found at the link below.

ir.westernunion.com/investor-relations/corporate-governance/governancedocuments/default.aspx

Our business, structure and supply chains

Western Union is a global leader in cross-border, cross-currency money movement and payments, with approximately 11,000 employees residing in more than 50 countries – 98% of whom are full time employees. Drawing on 170 years of connecting people, we enable businesses, financial institutions, government entities, and consumers to send and receive money and make payments through one of the world's most expansive, flexible, and versatile financial networks.

Our business consists of two primary segments.

- **Consumer-to-Consumer** - Our consumer-to-consumer operating segment facilitates money transfers, which are sent from our retail agent locations worldwide or through websites and mobile devices, including our fast-growing money transfer transactions conducted and funded through websites and mobile applications marketed under our brands (westernunion.com) and transactions initiated on the internet and mobile applications hosted by our third-party white label or co-branded digital partners. Our money transfer service is provided through one interconnected global network. This service is available for international cross-border transfers and, in certain countries, intra-country transfers.
- **Business Solutions** - Our Business Solutions operating segment facilitates payment and foreign exchange solutions, primarily cross-border, cross-currency transactions for small and medium size enterprises and other organizations and individuals. The majority of the segment's business relates to exchanges of currency at spot rates, which enable customers to make cross-currency payments. In addition, in certain countries, we write foreign currency forward and option contracts for customers to facilitate future payments.

Offering choice and access to our global customers

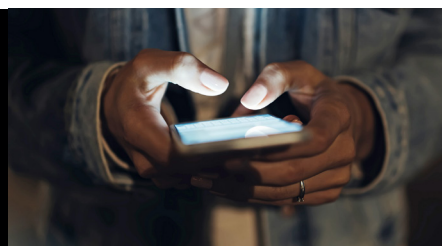
Services in
200+
countries & territories

Payout in
130+
currencies

Digital access via
westernunion.com in
75+
countries & territories

Account payout into billions
of bank accounts, millions of
digital wallets, and cards in:

120
countries



700+
University
customers



500+
financial institution
customers



1,000+
NGO
customers



90%+
Global brand
awareness

Real-time account payout in 100 countries

550,000+
retail locations in urban, rural,
and remote areas

Customer service in
38 Languages

To conduct our consumer and business services and to meet our commitments to our customers and stakeholders, Western Union sources from suppliers around the world. As of December 2020, our active vendor base consisted of thousands of companies. They provide a diverse range of goods and services, including cloud-based software services, software application support, the development, hosting and maintenance of our operating systems, merchant acquiring services, call center services, check clearing, processing of returned checks, and other operating activities.

Our policies and approach

At Western Union, we are committed to moving money with integrity and to enabling an effective, accountable, and transparent global financial infrastructure that protects individuals. To this end, we work with customers, regulators, and partners to mitigate the risks posed by illicit money movement, including the movement of money for the purposes of advancing human trafficking and modern slavery. It is in our interest to keep our services out of the hands of those who would use them to do harm. Through our shared values of trust and respect, we aim to:

- Avoid causing or contributing to negative human rights impacts.
- Prevent or mitigate abuses that occur in our operations and through those of our business partners.
- Promote human rights by contributing to the global communities we serve.

Aligned with the requirements under the Commonwealth Modern Slavery Act 2018 and the UK Modern Slavery Act 2015, we condemn modern slavery and human trafficking. We do not use forced or involuntary labor and prohibit this in any part of our business or supply chains. We expect all those involved in procurement or other parts of our business, including suppliers, to comply with these values. We are committed to acting ethically, demonstrating high professional standards, and complying with applicable laws and regulations. We expect the same high standards from those with whom we do business.

We recognize that the risks posed by modern slavery and human trafficking are constantly evolving, and so, too, must our efforts to combat it. Through our Anti-Human Trafficking Initiative, the Company helps detect, deter, and report human trafficking issues. This includes educating Western Union's global network of agents, its employees, and its partners about human trafficking and other forms of modern slavery. It also includes participating in external working groups, listed in more detail below, and working with law enforcement agencies and nonprofit entities. This collaboration plays an important part in helping us to remain actively engaged in evaluating the changing nature of modern slavery and human trafficking and adapting our approach to respond to prevailing threats.

Related Policies

Western Union's commitment to enforcing ethical business practices, including the detection and prevention of slavery and human trafficking, is embedded in our policies and procedures.

Our **Code of Conduct** sets out our shared values of being purpose driven, globally minded, and trustworthy and respectful, and serves as a guidepost for how we treat our employees, customers, business partners, and stakeholders. Our employees confirm they have read and will comply with our Code of Conduct, which not only condemns human rights abuses and prohibits the use of forced or involuntary labor, but also defines our employees' responsibility to speak up when they believe there to be possible violations of policies or law.

Our **global Anti-Money Laundering and Combating the Financing of Terrorism** policies set forth the principles for preventing Western Union's services from being used for illicit purposes.

Our **Code of Ethics for Senior Financial Officers** provides principles of ethical conduct to which each senior financial officer of the company is expected to adhere and advocate. This includes a commitment to promoting ethical behavior in the work environment and community.

Our **vendor risk policies** establish requirements to ensure we conduct appropriate risk assessments of potential vendors prior to engagement to ensure we engage quality and trustworthy vendors who meet our ethical standards.

Our **global sourcing and procurement policies** govern the acquisition of products and services worldwide and addresses ethical purchasing and risk mitigation, including risk related to human trafficking and modern slavery.

We also have policies that establish certain prohibitions or special handling/enhanced due diligence for engaging with clients, agents, or partners that may be associated with high-risk industries, including businesses that may have links to modern slavery and/or human trafficking. These clients remain in monitoring for such illicit activity over the lifespan of their relationship with Western Union.

Ethics Helpline

Our primary channel for reporting issues related to modern slavery and human trafficking is the **Ethics Helpline**. It is a secure and confidential mechanism for receiving and processing whistleblower reports and other ethics concerns. The Ethics Helpline allows employees and other reporters to raise concerns anonymously, subject to applicable law. Reports involving suspected human trafficking incidents can be made by visiting the Ethics Helpline internet site at wuethicshelpline.com or by phone. Both avenues for reporting concerns are available 24 hours a day, seven days a week, 365 days a year. The web-based reporting tool is available to individuals in six languages while the toll-free phone line supports calls in over 150 languages. The Ethics Helpline is administered by an external, independent, third-party vendor, and concerns reported through the Ethics Helpline are forwarded to the Western Union Ethics Office for review. Western Union reviews concerns raised and, as appropriate, investigates, and takes action. Western Union prohibits retaliation for raising concerns in good faith. In 2020, Western Union did not receive complaints through the Ethics Helpline involving suspected human trafficking incidents.

Risk assessment

In 2020, with the support of an external expert, we conducted an assessment that helped us identify and prioritize the negative human rights impacts that are most likely to arise in connection with our business and our business partners and develop mitigation and remediation strategies to address the impacts we identified. Informed by the UN Guiding Principles on Business and Human Rights and other internationally recognized standards, the assessment included:

- Desktop research analyzing Company publicly available information and reports by NGOs and other stakeholders.
- A review of internal documents, processes and procedures Western Union leverages to identify and manage human rights risk.
- Interviews with internal and external stakeholders.

One of the main impacts we identified was the wrongful use of our network by illicit actors to facilitate human trafficking and other human rights abuses that harm individuals and communities. Human traffickers can and do attempt to use platforms like Western Union's to recruit potential victims of human trafficking, finance the lodging and transportation of victims, and control victims. We recognize some of these risks are inherent to our role as a money movement and payments service provider, and some are due to external, contextual factors – such as conflict, weak rule of law, and the uneven application of the law – in the geographies where we operate.

Our leading compliance program, explained in more detail below, already helps manage these risks, but we have begun integrating additional lessons learned from the assessment to continuously improve our approach to combating human trafficking and modern slavery. This includes working to advance our internal governance structure with respect to human rights.

Steps we took in 2020 to address modern slavery

We take a multi-faceted approach to prevent our services from being used to facilitate illicit money movement associated with modern slavery and human trafficking. This includes utilizing a highly developed set of controls to monitor and analyze transactions; educating our agents, employees, and partners about human trafficking and other forms of modern slavery; and partnering with external organizations.

Compliance Program

The bedrock of our efforts in combating modern slavery is our leading compliance program. Our comprehensive global policies and procedures establish the framework for our compliance program, based on international standards created by organizations such as the Financial Action Task Force. In line with legal and regulatory requirements, our approach is risk-based. We conduct an annual Compliance Enterprise Risk Assessment to assess current or emerging risks and the effectiveness of our controls across our business lines, geographies, products, customers, partners, and agents.

Our compliance program is designed to manage complexity across geographies. Transactions between specific countries and cities pose varying risks. We manage each nuanced transaction risk across thousands of geographic connections. For example, we might treat a transaction from Madrid to Marrakesh differently than one from Barcelona to Casablanca. Although they are both Spain to Morocco, the risks of transactions between these locales may differ depending on a variety of factors, including the specific cities involved, the amount of the transfer, and the type of product.

We screen our transactions, as well as the data associated with our customers, clients, partners, and agents, against a range of government sanctions and other internal and external watch lists. We do this to identify prohibited parties and potentially illicit activity and may freeze or reject funds and transactions where required. Our transaction screening takes place while the money is moving and allows for the real-time collection of data to efficiently separate false positives from true matches. We also monitor transactions handled through our platform. Our systems are designed to detect potentially suspicious activity, block prohibited users and illicit activity, and suspend transactions for customer follow-up.

We continue to make significant compliance-related investments in people, processes, and technology, including state-of-the-art systems, predictive analytics, machine learning, and artificial intelligence. For example, our Real Time Risk Assessment engine analyzes threats, makes decisions, and takes action in milliseconds to prevent parties that meet specified parameters from completing transactions. We demonstrate our ongoing commitment through the transactions we process and partnerships we form.

Employee Training

We trained our employees on ethical conduct and reporting misconduct in our annual online [Code of Conduct](#) training. The training required employees to certify having read and understood the Code of Conduct, which prohibits the use of forced or involuntary labor, and pass a knowledge test. We also require our employees to complete compliance training at least annually, covering anti-money laundering, fraud prevention, anti-corruption, and other areas. In 2020, the training featured a section dedicated to preventing child sexual exploitation, sex trafficking, and labor trafficking and included a case study. Ongoing, targeted training also provides topic-specific education based on factors such as geography or employee job function.

Outreach

Last year, Western Union continued to raise awareness about human trafficking through hosting or attending numerous outreach events in countries across the globe. For example, in the Middle East, Western Union representatives facilitated presentations at the request of the United Nations Office on Drugs and Crime (UNODC) and also spoke at the 2020 MENA Association of Certified Anti-Money Laundering Specialists Conference. Western Union also participated in the UNODC Regional Expert Group Meeting (REGM) with private-public sector partners to further discuss human trafficking in South Eastern Europe.

Third Party Due Diligence

We know it is important to do business with the right people for the right reasons and are committed to complying with applicable economic and trade sanctions designed to support national and international security, policy, and human rights interests. Concerns related to human-trafficking are among the criteria that these sanctions programs use to impose sanctions on individuals or entities.

We also implement rigorous due diligence procedures to vet our agents and other business partners and take seriously our obligations to implement Know Your Customer (KYC) requirements. Under these processes, we collect and verify identifying information to make sure we know with whom we are conducting business. This information helps us identify sanctioned parties and others with whom we are prohibited from doing business and allows us to identify risk indicators and prevent transactions when necessary. Our due diligence and KYC programs, moreover, are informed by ongoing information-gathering efforts, through which new information may come to light.

Vendor Relations

Western Union maintains a Vendor Risk Oversight program to formalize how we review potential new vendors for risk. We take a risk-based approach to assess vendors for potential human trafficking or modern slavery within their business. We conduct due diligence before we enter into third party contracts to ensure potential risks are identified and mitigated as appropriate. For example, we identify vendors in high-risk jurisdictions as well as vendors that provide high-risk services and mitigate these risks through actions such as contractual terms.

The Vendor Risk Oversight program is overseen by the Vendor Risk Oversight Committee, which develops and monitors our framework for vendor risk oversight. The Committee consists of senior leaders and met throughout 2020.

Prior to working with Western Union, prospective vendors must complete our risk assessment process, which includes completion of a survey that is analyzed by applicable departments within Western Union who consider risks related to human trafficking and modern slavery. Western Union's contractual documentation and standard terms and conditions require third parties and their workers to comply with all applicable laws and regulations, including all applicable laws and regulations prohibiting human trafficking and modern slavery.

Agent Training and Oversight

Because many of our transactions are initiated or completed by third-party agents, it is particularly important to us that these partners do their part to ensure compliance with the law and regulations. In addition to conducting due diligence on our agents, we conduct risk-based reviews of their compliance programs. These reviews help us ensure that our agents comply with our requirements as well as laws and regulations on anti-money laundering and combating the financing of terrorism.

Western Union also trains our new agents to detect, prevent, and report numerous forms of suspicious activity—including activity potentially related to human trafficking and modern slavery—to Western Union and/or the appropriate regulatory agencies. All new agents must identify a compliance officer who must complete compliance program training before providing our services to consumers. Annually, agents must train employees across their network on our compliance program.

In addition to general human trafficking awareness training, WU also provides targeted training for certain agent locations. In Colombia, for example, we deployed targeted training for agent locations as part of a partnership with a local anti-human trafficking NGO and as a result of a cumulative analysis that examined geographies that may be higher risk for human trafficking.

Joining Forces to Prevent and Investigate Human Trafficking

We know our efforts to stop illicit activity through the use of our system are amplified when combined with those of other organizations that share the same goals. Collaboration and cooperation with external partners, including the sharing of techniques, strategies, and intelligence, helps us combat threats posed by international criminal organizations. Our Financial Intelligence Unit (FIU) works with external partners, such as law enforcement, other government agencies, and non-governmental and private organizations across the world, to address these risks.

Organizations and Associations: In 2020, our Anti-Human Trafficking Initiative—a team aiming to bring awareness to human trafficking issues to Western Union agents, industry partners, and others—continued to collaborate with partners to execute its mission. These partners include the Association of Certified Anti-Money Laundering Specialists; non-profits such as Stop the Traffik and Child Rescue Coalition; and both the International and National Centers for Missing and Exploited Children (NCMEC/ICMEC). Our work with NCMEC and ICMEC includes serving on the steering committee of the Financial Coalition Against Child Sexual Exploitation. This initiative works to disrupt the economics of entities that seek to profit from the sexual exploitation of children.

In 2020, we announced a new, industry-first collaboration with Child Rescue Coalition (CRC). This non-profit's mission is to rescue children from sexual abuse by building technology for law enforcement to track, arrest, and prosecute child predators. We became the first financial institution in the world leveraging CRC input to enhance our efforts and assist us as we work with law enforcement and other partners to help thwart and prosecute those who perpetrate this horrific crime.

We are also a member of the U.S. Department of Homeland Security's Blue Campaign, a national public awareness movement aimed at combating human trafficking.

Law Enforcement: Our FIU continued to partner with law enforcement and non-profits to better target and disrupt human trafficking financial flows. The FIU has conducted approximately 2,300 human trafficking investigations since 2013, resulting in hundreds of arrests and the rescue of hundreds of victims. For instance, the team has worked on the Joint Money Laundering Intelligence Taskforce (JMLIT) on investigations tackling child sexual abuse and exploitation. Led by the U.K.'s National Crime Agency, the JMLIT is a forum through which law enforcement and financial institutions may share tactical information.

COVID-19

2020 saw the COVID-19 pandemic disrupt the global economy, which eliminated a significant number of jobs and had a disparate impact on the migrant community. Such economic stress can increase the risks of forced labor among migrants and other vulnerable workers. In the face of lockdowns and movement restrictions across the globe, we quickly adapted to meet our customer needs, enabling them to become the frontline workers of economic security and provide critical support for loved ones across the globe.

We piloted several innovative initiatives to ensure that customers who were unaccustomed or unable to use digital transfers could still send and receive money. These included home delivery of money transfers in cash in select markets, including Colombia, Jordan, Nepal, and Sri Lanka. We also introduced a "digital location" concierge service in certain countries, which offered personalized phone or video support to help customers make digital money transfers from the comfort and safety of their homes. We also enabled our NGO clients to move money to fund global COVID-19 relief efforts.

Assessing the effectiveness of our actions

As mentioned above, this past year we partnered with an external expert, who helped us identify and prioritize Western Union's salient human rights risks and assessed the degree to which we managed risks.

In addition, over the past five years we have had more than 700 exams, audits, and third-party reviews across the 200 countries and territories where we operate. We regularly meet with regulators and banks from around the world to thoroughly review our programs. Additionally, our internal audit department conducts over 60 reviews a year to evaluate various aspects of our compliance program. These evaluations help us confirm that our programs are operating effectively.

Western Union also publishes information on its efforts preventing modern slavery and human trafficking in its annual [Environmental, Social, Governance \(ESG\) Report](#). The ESG report is prepared in accordance with Global Reporting Initiative (GRI) Standards: Core option. It also includes responses to select relevant metrics from the Sustainability Accounting Standards Board (SASB) Standards. This facilitates ESG ratings agencies to assess Western Union's ESG performance and supports data monitoring and measurement to assess the effectiveness of the Company's sustainability goals.

Looking forward

Western Union remains committed to leveraging our global footprint to help combat human trafficking and modern slavery in 2021 and beyond. Going forward, we will continue to look for new opportunities to engage our employees, customers, business partners, and stakeholders on this important issue and will develop our efforts through various measures, including:

- Publishing a human rights statement in 2021 explaining Western Union's approach to respecting and promoting human rights, including those of our employees, customers and consumers, and society at large, as well as the expectations we have of our business partners to share our values with respect to human rights. In line with international standards, our definition of human rights encompasses the right to be free from slavery and involuntary servitude.
- Advancing our human rights governance structure.
- Enhancing our Vendor Risk Oversight program to increase due diligence risk identification and implement an ongoing monitoring process to review vendors throughout the engagement life cycle. We will continue to enhance program governance for risk oversight, specifically as it relates to potential human trafficking or modern slavery within potential vendors.
- Continuing to ensure that training materials for employees and agents on how to identify, prevent, and report potential signs of human trafficking and modern slavery remain up to date.
- Expanding the reach of our global anti-human trafficking and modern slavery initiatives through a focus on continuing to strengthen our partnerships with law enforcement and non-governmental organizations in certain regions.

Consultation and approval

This statement is Western Union's fifth statement. It was drafted in consultation with several internal stakeholders from departments across the organization, who provided feedback throughout the process. It was approved by pertinent affiliates of The Western Union Company on the dates set out below.

Please direct any questions on this statement to Western Union's Ethics Office at: wuethics@westernunion.com



Andrew Pollock

Director
Western Union GB Limited
May 18, 2021



Massimiliano Alvisini

Director
Western Union Payment Services
Ireland Limited
May 20, 2021



Andrew Summerill

Director
Custom House Financial (UK) Limited
May 21, 2021



Nathan Fong

Director
Western Union Business Solutions
(Australia) Pty Ltd
May 27, 2021



Gregory Laurent

Director
Western Union Financial Services
(Australia) PTY LTD
May 27, 2021



Peter Bucher

Director
Western Union International
Bank GmbH
June 14, 2021



Graham Baker

Director
Western Union Retail Services
GB Limited
May 21, 2021



Graham Baker

Director
Western Union Payment Services
GB Limited
May 21, 2021

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Western Union's Modern Slavery and Human Trafficking Statement for 2019

June 30, 2020

- Introduction
- Our business and structure
- Our policies and approach
- Steps we took in 2019 in our core business to address modern slavery
- Steps we took in 2019 with third parties to address modern slavery
- Our future plans

WesternUnion // WU

Introduction

This Modern Slavery and Human Trafficking Statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 (the “Act”) and is our statement for the financial year ending in 2019. It applies to and has been approved by the boards of Custom House Financial (UK) Limited (company number 4380026), Western Union Retail Services GB Limited (company number 2383761), Western Union GB Limited (company number 4129906), Western Union Payment Services GB Limited (company number 11326797), Western Union International Bank GmbH (company number FN256184t), and Western Union Payment Services Ireland Limited (company number 471360) (collectively “Western Union”). Our Modern Slavery and Human Trafficking Statement for the previous financial years ending in 2016, 2017, and 2018 can be found here:

http://s21.q4cdn.com/100551446/files/doc_downloads/gov_documents/2019/Historical-Modern-Slavery-Statement.pdf

Our business and structure

Western Union is a leader in global money movement and payment services with approximately 11,500 employees in 55 countries.

Our consumer-to-consumer money transfer service enables people to send money around the world. As of December 31, 2019, our services were available through a global network of over 550,000 agent locations in more than 200 countries and territories, approximately 90% of which are located outside of the United States. Most of our agents are third parties. They include large networks such as post offices, banks and retailers, and other established organizations as well as smaller independent retail locations, which typically provide other consumer products and services.

Our Business Solutions services facilitate payment and foreign exchange solutions, primarily cross-border, cross-currency transactions, for small and medium-size enterprises and other organizations and individuals.

To conduct our consumer and business services and to meet our commitments to our customers and stakeholders, Western Union sources from suppliers around the world. Our active vendor base consists of approximately 7,000 companies. They

provide a diverse range of goods and services, including cloud-based software services; software application support; development, hosting and maintenance of our operating systems; merchant acquiring services; call center services; check clearing; processing of returned checks; and other operating activities.

Our policies and approach

As set out in our [Code of Conduct](#), Western Union is committed to promoting human rights through our shared values of trust and respect and by giving back to the global communities we serve. This commitment benefits our employees, customers, and the communities where we operate.

Western Union condemns modern slavery and human trafficking. We do not use forced or involuntary labor and prohibit this in any part of our business or supply chains. Western Union expects all those involved in procurement or other parts of our business, including suppliers, to comply with these values. We are committed to acting ethically, demonstrating high professional standards, and complying with applicable laws and regulations. We expect the same high standards from those with whom we do business.

Related Policies

Western Union's commitment to enforcing ethical business practices, including the detection and prevention of slavery and human trafficking, is embedded in our policies and procedures. Our [Code of Conduct](#) promotes our shared values of being purpose driven, globally minded, and trustworthy and respectful, and serves as a guidepost for how we treat our employees, customers, business partners, and stakeholders. Our employees confirm they have read and will comply with our [Code of Conduct](#), which not only condemns human rights abuses and prohibits the use of forced or involuntary labor, but also defines our employees' responsibility to speak up when they believe there to be possible violations of policies or law. Our confidential ethics helpline allows employees to raise concerns and provides for anonymity, subject to applicable law. Western Union reviews concerns raised and investigates and takes action, if appropriate. Western Union prohibits retaliation for raising concerns in good faith.

Our vendor risk policies establish requirements to ensure we conduct appropriate risk assessments of potential vendors prior to engagement to ensure we engage quality and trustworthy vendors who meet our ethical standards. Similarly, our procurement policies provide guidelines governing employees worldwide in the acquisition of products and services to ensure ethical purchasing and risk mitigation, including

addressing risk related to human trafficking and modern slavery. Our global Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT) policies provide additional guidance for employees on how to prevent Western Union's services from being used for illicit purposes.

Steps we took in 2019 in our core business to address modern slavery

Employee Training

Western Union trains our employees to detect, prevent, and report any activity potentially related to human trafficking and modern slavery in our annual online [Code of Conduct](#) training. In 2019, human trafficking was one of the four primary modules included in the online training, which covered topics like common forms of trafficking, identifying red flags, and employee reporting obligations. The training required employees to acknowledge having read and understood the content as well as pass a knowledge test.

Outreach

Last year, Western Union raised awareness about human trafficking through hosting or attending more than 25 outreach events in over ten countries focused on the issue. For example, we participated in National Human Trafficking Awareness Day in the United States by issuing a call to action to our employees worldwide to wear blue to raise awareness about the issue of human trafficking. Hundreds of Western Union employees, including our CEO and senior executives, across more than 10 countries participated.

Investigation

Western Union investigated a number of human trafficking cases in 2019 as part of its AML/CFT obligations and cooperated with law enforcement and non-governmental organizations to combat human trafficking. These cases are often initiated by our AML/CFT internal monitoring triggers, information from law enforcement, or publicly available news. Investigations generally consist of (i) transaction analysis to identify suspicious activity or connections to previous investigations; (ii) a due diligence review of open source intelligence; (iii) risk determination; and, as needed, (iv) risk mitigation measures, including interdiction, regulatory reporting, reporting to law enforcement, and/or internal control changes.

Steps we took in 2019 with third parties to address modern slavery

Vendor Relations

Western Union maintains a Vendor Risk Oversight program to formalize how we review potential new vendors for risk. We take a risk-based approach to assess vendors for potential human trafficking or modern slavery within their business. We conduct due diligence before we enter into third party contracts to ensure potential risks are identified and mitigated as appropriate. For example, we identify vendors in high-risk jurisdictions as well as vendors that provide high-risk services and mitigate these risks through actions such as contractual terms.

The Vendor Risk Oversight program is overseen by the Vendor Risk Oversight Committee, which develops and monitors our framework for vendor risk oversight and ensures alignment to strategic priorities and internal control and oversight of strategic and emerging vendor risks. The Committee consists of senior leaders throughout the organization and met throughout 2019.

Prior to working with Western Union, prospective vendors must complete our risk assessment process, which includes completion of a survey that is analyzed by applicable departments within Western Union who consider risks related to human trafficking and modern slavery. Western Union's contractual documentation and standard terms and conditions require third parties and their workers to comply with all applicable laws and regulations, including all applicable laws and regulations prohibiting human trafficking and modern slavery. Vendors are also subject to additional due diligence.

Agent Training

Western Union trains our new agents to detect, prevent, and report numerous forms of suspicious activity—including activity potentially related to human trafficking and modern slavery—to Western Union and/or the appropriate regulatory agencies. In 2019, we rolled out Human Trafficking Awareness training for a targeted set of agent locations determined to be at higher risk for trafficking-related activity based on a transactional analysis.

Risk Assessments and Monitoring

In 2019, Western Union conducted risk assessments on new and potential vendors. We recognize that the risks posed by modern slavery and human trafficking are constantly changing. As such, we continue to monitor the effectiveness of our approach to preventing human trafficking and modern slavery in our business and supply chains. Our participation in working groups and work with law enforcement

agencies and nonprofit entities plays an important part in helping us to monitor the changing nature of slavery and human trafficking and to refine our approach to combatting it.

In 2019, we maintained a programmatic approach to addressing human trafficking risks. This included appropriate interdiction using social network analysis, which enabled us to disrupt human trafficking networks. It also featured real time transaction controls and threat analysis to monitor and decline transactions that met specified parameters.

Collaboration with Law Enforcement, Government Organizations, and Nonprofits

We developed a global Anti-Human Trafficking initiative to help detect, deter, and report the misuse of Western Union services. In collaboration with law enforcement, governmental, non-governmental and private organizations, and other stakeholders, Western Union's Anti-Human Trafficking initiative raises awareness about human trafficking for Western Union agents, employees and industry partners to help them detect, investigate, disrupt and communicate potential human trafficking issues to law enforcement. Our Financial Intelligence Unit has been involved in more than 1,800 human trafficking investigations since 2013, resulting in hundreds of arrests and the rescue of hundreds of victims.

As part of the initiative, we participated in multiple working groups designed to address modern slavery. These included:

- ***Combating Human Trafficking at the Super Bowl:***
We took part in an initiative designed to disrupt human trafficking connected to the Super Bowl in Miami, Florida. The group was comprised of financial industry leaders, NGOs, and law enforcement.
- ***U.S. Financial Coalition Against Child Sexual Exploitation:***
We participated in the work of this organization, whose mission is to disrupt the economics of child pornography business.
- ***International Data Hub:***
We continued our participation in an international data hub among NGOs, law enforcement, and financial institutions. This data hub uses machine-learning and structured data from contributors to identify the characteristics of human trafficking incidents and is designed to more easily facilitate the exchange of information about human trafficking across organizations.
- ***Expert Working Group on Human Trafficking and Organised Immigration Crime:***
We continued operating as a member of this subgroup of the Joint Money Laundering Intelligence Taskforce. The Taskforce, whose members include financial institutions, law enforcement agencies and the UK Home Office, exchanges information regarding human trafficking and shares typologies to identify and disrupt the financing of human trafficking and modern slavery.

- ***Interpol Human Trafficking Experts Group:***
We continued our participation in this group, which facilitates the sharing of best practices and information, supports international and regional investigations, and operations, and develops specialized training standards and curricula to educate about and combat human trafficking.
- ***U.S. Department of Homeland Security's Blue Campaign:***
We contributed to the Blue Campaign's social media channels, including a call-to-action to report suspected human trafficking activity to the National Human Trafficking Hotline.
- ***European Bankers Alliance :***
We continued to engage with the European Bankers Alliance, a multi-stakeholder working group on human trafficking and modern slavery issues established by the Thomson Reuters Foundation and of which Western Union is a founding member.
- ***Fintel Alliance :***
We continued operating as a member of this public-private intelligence analysis partnership organized and run by AUSTRAC, the Australian Financial Intelligence Unit. The Alliance's goal is to connect banks, money remitters, and law enforcement partners to fight serious financial crimes, including child exploitation.

Our future plans

Western Union remains committed to leveraging our global footprint to help combat human trafficking and modern slavery in 2020 and beyond. Going forward, we will continue to look for new opportunities to engage our employees, customers, business partners, and stakeholders on this important issue and will develop our efforts through various measures, including:

- Enhancing our Vendor Risk Oversight program to increase due diligence risk identification and implement an ongoing monitoring process to review vendors throughout the engagement life cycle. We will continue to enhance program governance for risk oversight, specifically as it relates to potential human trafficking or modern slavery within potential vendors.
- Continuing to ensure that training materials for employees and agents on how to identify, prevent, and report potential signs of human trafficking and modern slavery remain up to date.
- Expanding employee engagement with Western Union's global Anti-Human Trafficking initiative across the organization.
- Remaining focused on investigative work and cooperating with law enforcement and non-governmental organizations across the globe.

- Expanding the reach of our global anti-human trafficking and modern slavery initiatives through a focus on continuing to strengthen our partnerships with law enforcement and non-governmental organizations in certain regions.

Please direct any questions on this statement to Western Union's Ethics Office at: wuethics@westernunion.com

This statement is Western Union's fourth Modern Slavery and Human Trafficking Statement. It was approved by pertinent subsidiaries of The Western Union Company on the dates set out below.



Andrew Summerill

Director
Custom House Financial (UK) Limited
May 18, 2020



Massimiliano Alvisini

Director
Western Union Payment Services Ireland Limited
May 21, 2020



Graham Baker

Director
Western Union Retail Services GB Limited
May 15, 2020



Graham Baker

Director
Western Union GB Limited
May 6, 2020



Andrew Pollock

Director
Western Union GB Limited
May 15, 2020



Peter Bucher

Director
Western Union International Bank GmbH
May 18, 2020

WesternUnion\\WU

Western Union's Modern Slavery and Human Trafficking Statement



**Western
Union**

- Introduction
- The structure of our company
- Our policy and approach
- Steps we take in our core business to address modern slavery
- Steps we take with our third parties to address modern slavery
- Steps we took in 2018 to address modern slavery
- Our related policies
- Our future plans
- Effectiveness/monitoring

Introduction

This Slavery and Human Trafficking Statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 (the “Act”) and is our statement for the financial year ending in 2018. It applies to and has been approved by the boards of Custom House Financial (UK) Limited (company number 4380026), Western Union Retail Services GB Limited (company number 2383761), Western Union GB Limited (company number 4129906), Western Union International Bank GmbH (company number FN256184t), and Western Union Payment Services Ireland Limited (company number 471360) (collectively “Western Union”). Our Slavery and Human Trafficking Statement for the previous financial years ending in 2016 and 2017 can be found here:

ir.westernunion.com/investor-relations/corporate-governance/governance-documents/default.aspx

The structure of our company

Western Union is a leader in global payment services with employees in over 50 countries and agent locations in over 200 countries and territories. Western Union Business Solutions, an affiliate of Western Union, is a leading global provider of cross-border business payments, with one of the largest and most diverse payment networks. Our agents, whether small family-owned businesses or major retail chains, form part of our core business operations by offering Western Union money transfer and payment services to consumers and businesses. Western Union’s supply chains are limited as the company does not produce, manufacture or retail goods.

Our policy and approach

Western Union condemns modern slavery and human trafficking and has developed a global Anti-Human Trafficking initiative to help detect, deter, and report the misuse of Western Union services. Working in collaboration with law enforcement, governmental, non-governmental and private organizations, and other stakeholders, Western Union’s Anti-Human Trafficking initiative raises awareness about human trafficking for Western Union agents, employees and industry partners to help them detect, investigate, disrupt and communicate potential human trafficking issues to law enforcement. Western Union is committed to reinforcing that no such practices should take place in any of our supply chains or in any part of our business. Western Union expects all those involved in procurement or other parts of its business,

including suppliers, to comply with these values.

Western Union is committed to acting ethically, demonstrating the highest professional standards, and complying with applicable laws and regulations. We expect the same high standards from those with whom we do business.

Steps we take in our core business to address modern slavery

Western Union trains our employees to detect, prevent, and report any activity potentially related to human trafficking and modern slavery. Agent employees receive similar training and are required to report any suspicious activity to Western Union and/or the appropriate regulatory agencies.

Further, Western Union partners with governmental agencies to help combat human trafficking and modern slavery and works with law enforcement, regulators, and non-governmental organizations to build a knowledge base and raise awareness.

Steps we take with our third parties to address modern slavery

Western Union's Global Sourcing and Procurement Policy provides guidance to support the ethical procurement of goods and services and upholds our Code of Conduct. As part of the Company's procurement process and procedures, third parties are subject to due diligence and required to affirm that they comply with all applicable laws and regulations, including all applicable laws and regulations prohibiting human trafficking and modern slavery.

Appropriate terms are included in our contractual documentation and standard terms and conditions, to require third parties and third parties' workers to comply with all applicable laws and regulations. If Western Union determines actual or potential risk of human trafficking or modern slavery in a third party's business or supply chain, Western Union will take appropriate steps, which could include contract termination.

Western Union's Financial Intelligence Unit partners with law enforcement and nonprofit entities to pursue intelligence that can help target and disrupt human trafficking financial flows. This Unit also has a global law enforcement outreach program that includes cooperation efforts with police investigations in the fight against human trafficking.

Steps we took in 2018 to address modern slavery

- Trained employees and agents on how to identify, prevent, and report potential signs of human trafficking and modern slavery, including providing targeted human trafficking awareness training for certain agent locations determined to be at higher risk for trafficking-related activity.
- Attended and hosted outreach events on a worldwide basis focused on human trafficking.
- Conducted investigative work and information sharing with law enforcement and non-governmental organizations.
- Updated our company's financial crime risk assessments.
- Joined and/or participated in working groups designed to address modern slavery.
 - Joined as a founding member of an international datahub between NGOs, law enforcement, and financial institutions. This datahub uses machine-learning and structured data from contributors to identify the characteristics of human trafficking incidents and is designed to more easily facilitate the exchange of information about human trafficking across organizations.
 - Became a member of the Expert Working Group on Human Trafficking and Organised Immigration Crime, which is a subgroup of the Joint Money Laundering Intelligence Taskforce. The Taskforce, whose members include financial institutions, law enforcement agencies and the UK Home Office, exchanges information regarding human trafficking and shares typologies to identify and disrupt the financing of human trafficking and modern slavery.
 - Became a founding member of the U.S. Department of Homeland Security's Blue Campaign and worked in collaboration with NGOs, private companies, law enforcement and governments to protect the basic right of freedom and to bring those who exploit human lives to justice.
 - Participated in other initiatives, including: Interpol Expert Working Group on Trafficking in Human Beings; Stand Together Against Trafficking ("STAT"); the Super Bowl Human Trafficking Disruption Taskforce; and Thomson Reuters Foundation's Banks Alliance Against Trafficking.

Our related policies

Western Union seeks to identify and mitigate risk and enforce ethical business practices, including the detection and prevention of slavery and human trafficking, through integrating our policies and procedures across the scope of our business activities. In addition, Western Union employees confirm they have read and will comply with the Company's Code of Conduct, which condemns human rights abuses and prohibits the use of forced or involuntary labor.

Western Union's confidential ethics helpline allows those with good faith concerns of wrongdoing or breaches of the law or company policy to raise their concerns and provides for anonymity, subject to applicable law. Western Union prohibits retaliation for raising concerns in good faith. Western Union reviews concerns raised and conducts an investigation, if appropriate, and takes action, if appropriate.

Our future plans

Western Union is committed to combatting human trafficking and modern slavery.

Ongoing measures include:

- Implementing a Vendor Risk Oversight program to formalize how we review potential new vendors for risk and establishing an ongoing monitoring process to review these vendors throughout the engagement life cycle. Through this program, Western Union will take a risk-based approach to assess vendors for potential human trafficking or modern slavery within their business.
- Updating training materials for employees and agents on how to identify, prevent, and report potential signs of human trafficking and modern slavery.
- Continuing investigative work and information sharing with law enforcement and non-governmental organizations.
- Reviewing contractual processes to consider further improvement to contract language to reduce risks.

Effectiveness/monitoring

Western Union recognizes that the risks posed by slavery and human trafficking are constantly changing. As such, Western Union continues to monitor the effectiveness of our approach to preventing human trafficking and slavery in our business and supply chains. Our participation in working groups and work with law enforcement agencies and nonprofit entities plays an important part in helping us to monitor the changing nature of slavery and human trafficking and to refine our approach to combatting it.

Please direct any questions on this statement to Western Union's Ethics Office at: wuethics@westernunion.com

This statement is Western Union's third statement. It was approved by pertinent subsidiaries of The Western Union Company on the dates set out below.



Andrew Summerill

Director

Custom House Financial (UK) Limited

June 10, 2019



Andrew Pollock

Director

Western Union Retail Services GB Limited

June 10, 2019



Andrew Pollock

Director

Western Union GB Limited

June 10, 2019



Peter Bucher

Director

Western Union International Bank GmbH

June 19, 2019



Massimiliano Alvisini

Director

Western Union Payment Services

Ireland Limited

May 31, 2019

Western Union's UK Modern Slavery and Human Trafficking Statement

Introduction

This Slavery and Human Trafficking Statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 (the "Act") and constitutes our Statement for the financial year ending in 2017. Our Slavery and Human Trafficking Statement for the previous financial year ending in 2016 can be found here:

[<http://ir.westernunion.com/investor-relations/corporate-governance/governance-documents/default.aspx>]

The Structure of our Company

Western Union is a leader in global payment services, with employees based in over 50 countries around the world and agent locations in over 200 countries and territories. Western Union Business Solutions, an affiliate of Western Union, is a leading global provider of cross-border business payments, with one of the largest and most diverse payment networks. Our agents, whether small family-owned businesses or major retail chains, form part of our core business operations by offering Western Union money transfer and payment services to consumers and businesses. Western Union supply chains are limited as it does not produce, manufacture or retail goods.

Our Policy and Approach

Western Union has zero tolerance to slavery and human trafficking, and is committed to reinforcing that no such practices should take place in any of our supply chains or in any part of our business. Western Union expects all those involved in procurement for the company, or involved in any other part of our business, including suppliers to comply with these values.

Western Union is committed to acting ethically and works to the highest professional standards and seeks to comply with all laws, regulations and rules relevant to our business. We expect the same high standards from those we conduct business with.

Steps we take in our core business to address Modern Slavery

Western Union trains our employees to detect, prevent, and report any activity potentially related to human trafficking and modern slavery. Agent employees receive similar training and are required to report any suspicious activity to Western Union and/or the appropriate regulatory agencies.

In addition, Western Union employees confirm they have read and understand the Company's Code of Conduct, which condemns human rights abuses and prohibits the use of forced or involuntary labor.

Further, Western Union partners with governmental agencies to help combat human trafficking and modern slavery, working with law enforcement, regulators, and non-governmental organizations to build a knowledge base and awareness of the issues.

In the financial year ending 2017, we took the following steps in our core business to address Modern Slavery:

- Trained employees and agents on how to identify, prevent, and report potential signs of human trafficking and modern slavery;
- Attended and hosted outreach events on a worldwide basis focused on human trafficking;
- Conducted investigative work and information sharing with law enforcement and non-governmental organisations;
- Improved contract language for new and renewing agents to reduce risk; and
- Updated our company's financial crime risk assessments

Steps we take with our third parties to address Modern Slavery

Western Union's Global Sourcing and Procurement Policy provides guidance to support the ethical procurement of goods and services, and upholds our Code of Conduct. As part of the Company's procurement process and procedures, third parties are subject to due diligence and required to affirm that human trafficking and modern slavery is not occurring in their business or supply chain. Where Western Union outsources its business functions, it also assesses whether the risks may be more prevalent due to the location concerned.

Appropriate terms are included in our contractual documentation, standard terms and conditions, to require third parties to comply with the Act. If Western Union determines actual or potential risk of human trafficking or modern slavery in a third party's business or supply chain, Western Union will take the appropriate steps. This may include contract termination.

In the financial year ending 2017, we took the following steps with our third parties to address Modern Slavery:

- Requested suppliers to uphold our values on human trafficking and modern slavery; and
- Reviewed vendor processes, policies, procedures and terms of business for the procurement of goods and services

Our Related Policies

Western Union seeks to identify and mitigate risk and enforce ethical business practices, including the detection and prevention of slavery and human trafficking, through integrating our policies and procedures across the scope of our business activities. Our approach ensures that the environment is not conducive to crime or allowing modern slavery and human trafficking, and allows such risks to be addressed.

Western Union's confidential helpline encourages those with genuine concerns of wrongdoing or breaches of the law or company policy to raise their concerns in confidence and without fear of retaliation. Western Union will assess any instances of non-compliance as they arise on a case by case basis and take action as required.

Our Future Plans

Western Union is committed to combatting human trafficking and modern slavery, and will continue to require its third parties to ensure that human trafficking and modern slavery is not occurring in their business or supply chain. Ongoing measures include;

- Continuing investigative work and information sharing with law enforcement and non-governmental organisations;
- Reviewing and amending vendor engagement processes, policies and procedures for the procurement of goods and services;
- Obtaining formal confirmation from suppliers that no slavery or human trafficking is used within their business or supply chains and that appropriate policies and procedures have been established to maintain this position;
- Updating training materials for employees and agents on how to identify, prevent, and report potential signs of human trafficking and modern slavery; and
- Reviewing contractual processes to consider further improvement to contract language to reduce risks.

Please direct any questions on this statement to Western Union's Ethics Office at wuethics@westernunion.com

This statement is Western Union's second statement. It was approved by pertinent subsidiaries of The Western Union Company on the dates set out below.



Andrew Pollock

Western Union GB Ltd

Director

Date: 14 December 2018

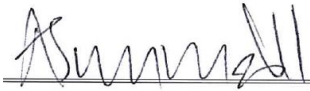


Massimiliano Alvisini

Western Union Payment Services Ireland Ltd

Director

Date: 12 December 2018



Andrew Summerill

Western Union Business Solutions UK Ltd

Director

Date: 12 December 2018

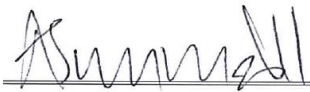


Andrew Pollock

Western Union Retail Services GB Ltd

Director

Date: 14 December 2018



Andrew Summerill

Custom House Financial UK Ltd

Director

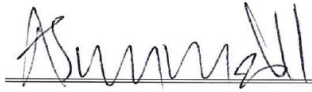
Date: 12 December 2018



Western Union International Bank GmbH

Director

Date: 26 November 2018

A handwritten signature in black ink, appearing to read 'Andrew Summerill', written over a horizontal line.

Andrew Summerill

WUBS Payments Ltd

Director

Date: 12 December 2018

Western Union's UK Modern Slavery and Human Trafficking Statement

Introduction

This Slavery and Human Trafficking Statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 (the "Act") and constitutes our Statement for the financial year ending in 2016.

The Structure of our Company

Western Union is a leader in global payment services, with employees based in over 50 countries around the world and agent locations in over 200 countries and territories. Western Union Business Solutions, an affiliate of Western Union, is a leading global provider of cross-border business payments, with one of the largest and most diverse payment networks. Our agents, whether small family-owned businesses or major retail chains, form part of our core business operations by offering Western Union money transfer and payment services to consumers and businesses. Western Union supply chains are limited as it does not produce, manufacture or retail goods.

Our Policy and Approach

Western Union has zero tolerance to slavery and human trafficking, and is committed to reinforcing that no such practices should take place in any of our supply chains or in any part of our business. Western Union expects all those involved in procurement for the company, or involved in any other part of our business, including suppliers to comply with these values.

Western Union is committed to acting ethically and works to the highest professional standards and seeks to comply with all laws, regulations and rules relevant to our business. We expect the same high standards from those we conduct business with.

Steps we take in our core business to address Modern Slavery

Western Union trains our employees to detect, prevent, and report any activity potentially related to human trafficking and modern slavery. Agent employees receive similar training and are required to report any suspicious activity to Western Union and/or the appropriate regulatory agencies.

In addition, Western Union employees confirm they have read and understand the Company's Code of Conduct, which condemns human rights abuses and prohibits the use of forced or involuntary labor.

Further, Western Union partners with governmental agencies to help combat human trafficking and modern slavery, working with law enforcement, regulators, and non-governmental organizations to build a knowledge base and awareness of the issues.

Steps we take with our third parties to address Modern Slavery

Western Union's Global Sourcing and Procurement Policy provides guidance to support the ethical procurement of goods and services, and upholds our Code of Conduct. As part of the Company's procurement process and procedures, third parties are subject to due diligence and required to affirm that human trafficking and modern slavery is not occurring in their business or supply chain. Where Western

Union outsources its business functions, it also assesses whether the risks may be more prevalent due to the location concerned.

Appropriate terms are included in our contractual documentation, standard terms and conditions, to require third parties to comply with the Act. If Western Union determines actual or potential risk of human trafficking or modern slavery in a third party's business or supply chain, Western Union will take the appropriate steps. This may include contract termination.

Our Related Policies

Western Union seeks to identify and mitigate risk and enforce ethical business practices, including the detection and prevention of slavery and human trafficking, through integrating our policies and procedures across the scope of our business activities. Our approach ensures that the environment is not conducive to crime or allowing modern slavery and human trafficking, and allows such risks to be addressed.

Western Union's confidential helpline encourages those with genuine concerns of wrongdoing or breaches of the law or company policy to raise their concerns in confidence and without fear of retaliation. Western Union will assess any instances of non-compliance as they arise on a case by case basis and take action as required.

Our Future Plans

Western Union is committed to combatting human trafficking and modern slavery, and will continue to require its third parties to ensure that human trafficking and modern slavery is not occurring in their business or supply chain. Ongoing measures include;

- Reviewing policies, procedures and terms of business for the procurement of goods and services;
- Obtaining formal confirmation from suppliers that no slavery or human trafficking is used within their business or supply chains and that appropriate policies and procedures have been established to maintain this position;
- Training employees and agents on how to identify, prevent, and report potential signs of human trafficking and modern slavery; and
- Reviewing contractual processes to consider what amendments are required to reduce the risks.

Please direct any questions on this statement to Western Union's Ethics Office at wuethics@westernunion.com

This statement is Western Union's first such statement and was approved by pertinent subsidiaries of The Western Union Company on 19 June 2017.